



USA K&D

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 8698

UNITED STATES OF AMERICA,
Plaintiff,

v.

Maria del Carmen GUERRERO-Ramos (1)
Juan Pedro GUERRERO-Manjarrez (2)
Defendants.

Magistrate Case No.:
COMPLAINT FOR VIOLATION OF
21 U.S.C. § 952 and 960
Importation of a Controlled Substance
(Felony)

The undersigned complainant being duly sworn states:

COUNT I

That on or about August 5, 2008, within the Southern District of California, defendants Maria del Carmen GUERRERO-Ramos and Juan Pedro GUERRERO-Manjarrez did knowingly and intentionally import approximately 7.46 kilograms (16.41 pounds) of methamphetamine, a Schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, sections 952 and 960.

COUNT II

That on or about August 5, 2008, within the Southern District of California, defendants Maria del Carmen GUERRERO-Ramos and Juan Pedro GUERRERO-Manjarrez did knowingly and intentionally import approximately 19.64 kilograms (43.21 pounds) of cocaine, a Schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.



Rosalinda Estrada, Special Agent
Immigration and
Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 6TH
DAY OF AUGUST 2008.



PETER C. LEWIS
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Maria del Carmen GUERRERO-Ramos (1)

4 Juan Pedro GUERRERO-Manjarrez (2)

5 STATEMENT OF FACTS

6 This Statement of Facts is based on the reports, documents, and notes
7 furnished to U. S. Immigration and Customs Enforcement Special Agent Rosalinda
8 Estrada.

9 On August 8, 2008, at approximately 0900 hours, Maria del Carmen
10 GUERRERO-Ramos (GUERRERO-Ramos) and her husband, Juan Pedro
11 GUERRERO-Manjarrez (GUERRERO-Manjarrez), attempted to enter the United States
12 from the Republic of Mexico through the Calexico, California, west port of entry.
13 GUERRERO-Ramos and GUERRERO-Manjarrez were the registered owners of a 1992
14 Nissan Sentra bearing California license plates 5HZL194.

15 During a pre-primary roving operation, Canine Enforcement Officer (CEO) J.
16 Jones received a positive alert from his assigned Human Narcotics Detector Dog
17 (HNDD). CBPO Mendibles was notified and responded.

18 During the pre-primary inspection, Customs and Border Protection Officer
19 (CBPO) Mendibles received a negative oral Customs declaration from GUERRERO-
20 Ramos. When CBPO Mendibles inquired about the vehicle, GUERRERO-Ramos stated
21 the vehicle belonged to her. GUERRERO-Ramos further stated they were in Mexicali,
22 Baja California, Mexico, for two days visiting family and were now on their way back
23 home to Santa Ana, Californina.

24 During the primary inspection, CBPO Zuniga received a negative oral Customs
25 declaration from GUERRERO-Ramos. GUERRERO-Ramos and GUERRERO-
26 Manjarrez were then escorted out of the vehicle to the Vehicle Secondary Office and
27 the vehicle was taken to the vehicle secondary lot for further inspection.

28 During secondary examination, CBPO Mendibles discovered (25) packages
29 wrapped in black tape and clear cellophane tape, concealed inside the rear quarter

1 panels of the vehicle. Seventeen (17) packages contained a white powdery substance
2 that when probed, field-tested positive for cocaine and eight (8) packages contained a
3 clear crystal substance that when probed, field-tested positive for methamphetamine.

4 The (17) packages of cocaine had a combined weight of approximately 19.64
5 kilograms (43.21 pounds). The (8) packages of methamphetamine had a combined
6 weight of approximately 7.46 kilograms (16.41 pounds).

7 GUERRERO-Ramos was advised of her rights per Miranda. GUERRERO-
8 Ramos stated to Special Agent Estrada that she and her husband, GUERRERO-
9 Manjarrez were going to be paid \$4,000.00 for the smuggling narcotics into the United
10 States.